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February 14, 2024

VIA ECF

Honorable Michael A. Shipp, U.S.D.J.
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

***Re: In re: Johnson & Johnson Talcum Powder Products, Marketing,
Sales Practices, and Products Liability Litigation***
Case No.: 3:16-md-02738-MAS-RLS

Dear Judge Shipp:

On behalf of the Plaintiffs' Steering Committee (PSC) we write to state that we have reviewed the Morelli Law Firm letter that was filed on the docket on February 8, 2024 (Dkt. No. 29020) that seeks guidance from the Court regarding a purported inconsistency between Case Management Order No. 9 (ECF No. 27293) and the Court's Order of October 10, 2023 Governing Amendments to Complaints (ECF No. 28519), as well as the letter response of counsel for the Johnson & Johnson Defendants (Susan M. Sharko, Esquire) filed on the docket on February 12, 2024 (ECF No. 29029).

We also wish to advise the Court that the Plaintiffs' Leadership Committee has been and remains communicative and responsive to the questions and concerns of the MDL firms on all issues impacting the governance of this MDL. In particular, Leadership has had direct communications with the Morelli firm to decisively address their particular questions on this issue. We note, as does Ms. Sharko, that CMO 9 provides a mechanism for the Morelli Law Firm to obtain relief from the deadline in CMO 9 (February 28, 2024), i.e., by filing and serving a notice as to why Mr. Morelli is unable to meet the deadline for the Court to consider for granting relief.

Hon. Michael A. Shipp, U.S.D.J.

February 14, 2024

Page 2

Respectfully submitted,

s/ P. Leigh O'Dell

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s/ Michelle A. Parfitt

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Plaintiffs' Co-Lead Counsel

cc: All Counsel (via ECF)